

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

*County of Webb, Texas v. Purdue Pharma
L.P. et al.*, No. 1:18-op-45175-DAP

MDL No. 2804

Case No. 1:17-MD-2804

Judge Dan Aaron Polster

STIPULATION

Plaintiff County of Webb, Texas (“Plaintiff”) and Defendants Richard Sackler, Beverly Sackler, David Sackler, Ilene Sackler Lefcourt, Jonathan Sackler, Kathe Sackler, Mortimer D.A. Sackler, and Theresa Sackler (“Individual Former Directors”), by and through their undersigned counsel, submit this Stipulation and state as follows:

WHEREAS Plaintiff commenced this action against the Individual Former Directors by filing its Second Amended Complaint in the multidistrict litigation *In re: National Prescription Opiate Litigation*, MDL No. 2804 (N.D. Ohio) (“MDL proceeding”); and

WHEREAS all responsive pleading deadlines for actions in the MDL proceeding other than those referenced in paragraphs 2 or 3 of CMO-1 [Dkt. 232] are stayed pending further court order.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff and the undersigned counsel for the Individual Former Directors that:

1. The undersigned counsel for the Individual Former Directors hereby accepts service of Plaintiff's Second Amended Complaint in this action and certifies that they are authorized to do so;

2. The deadline for the Individual Former Directors to move or otherwise respond to Plaintiffs' Second Amended Complaint shall be sixty (60) days from entry of an order lifting the stay as to responsive pleadings in cases not referenced in paragraphs 2 or 3 of CMO-1, or such other date as the court in the MDL proceeding may order, whichever is later;

3. In the event that this action is transferred from the MDL proceeding to the federal district court in which it was initially filed ("transferee court"), the deadline for the Individual Former Directors to move or otherwise respond to the Second Amended Complaint shall be sixty (60) days from entry of the transfer order, or such other date as the transferee court may order, whichever is later; and

4. By entering into this Stipulation, Plaintiff agrees that the Individual Former Directors neither submit to the jurisdiction of this Court or the court in which this action was originally filed nor waive any defense, including lack of personal jurisdiction. The Individual Former Directors waive only the defenses of insufficient process and insufficient service of process.

DATED: September 23, 2019

/s/ Joanne Cicala

Joanne Cicala
The Cicala Law Firm PLLC
101 College Street
Dripping Springs, Texas 78620
Tel: (512) 275-6550
Fax: (512) 858-1801
joanne@cicalapllc.com

Attorney for Plaintiff County of Webb, Texas

DATED: September 23, 2019

/s/ Stuart G. Parsell

Stuart G. Parsell (Ohio Bar No. 0063510)
Ariel A. Brough (Ohio Bar No. 0090712)
ZEIGER, TIGGES & LITTLE LLP
41 South High Street, Suite 3500
Columbus, Ohio 43215
Tel: (614) 365-9900
Fax: (614) 365-7900
parsell@litohio.com
brough@litohio.com

Attorneys for Richard Sackler, Jonathan Sackler,
Mortimer D.A. Sackler, Kathe Sackler, Ilene
Sackler Lefcourt, Beverly Sackler, Theresa Sackler,
and David Sackler

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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record at their e-mail addresses on file with the Court.

/s/ Josh Wackerly
Josh Wackerly